

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Parcel Select Contracts 6 (MC2013-13)
Negotiated Service Agreement

Docket No. CP2013-13

PUBLIC REPRESENTATIVE COMMENTS ON
POSTAL SERVICE AMENDMENT TO
PARCEL SELECT CONTRACT 6

(March 27, 2015)

The Public Representative hereby provides comments pursuant to Order No. 2407.¹ In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of an amendment to Parcel Select Contract 6.² The Notice includes a redacted copy of the amendment as Attachment A, with an unredacted version filed under seal.

The amendment changes the pricing calculation applicable to the second and subsequent years of the Parcel Select Contract 6 contract. Attachment A at 1 - 2. The Commission previously approved the addition of Parcel Select Contract 6, which contains rates not “of general applicability,” to the competitive product list in Docket Nos. MC2013-13 and CP2013-13.³

The Postal Service maintains that the amendment “will not materially affect the cost coverage” of the contract. *Notice* at 1. As a result, the Postal Service states that “supporting financial documentation and financial certification initially provided in this

¹ PRC Order No. 2407, Notice and Order Concerning Amendment to Parcel Select Contract 6, March 23, 2015.

² Notice of United States Postal Service of Amendment to Parcel Select Contract 6, With Portions Filed Under Seal, March 20, 2015 (Notice).

³ See PRC Order No. 1538, Order Adding Parcel Select Contract 6 to the Competitive Product List, November 8, 2012.

docket remain applicable.” *Id.* The amendment will become effective “one business day after the Commission completes its review of this filing.” *Id.*

COMMENTS

The Public Representative has reviewed the contract amendment, initial contract, and supporting financial worksheet filed under seal with the Postal Service’s Notice in Docket Nos. MC2013-13 and CP2013-13. The Postal Service does not update its supporting financial data, which limits the Public Representative’s ability to analyze how the requested amendments in this Docket will impact present or future cost coverage. Nonetheless, based on a review of the original financial worksheet, which includes projected cost coverage, the requested amendments will not materially affect the Postal Service’s compliance with 39 U.S.C. § 3633(a). The Public Representative does not object to the Postal Service’s requested amendments if similar cost coverage occurs in the second and third years.

The Public Representative respectfully submits the foregoing comments for the Commission’s consideration.

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